

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
CRAIG BRADLEY DEIMLER	:	
WILLIAM OLIVER FISHER-DEIMLER	:	CASE NO. 1:20-bk-00841
aka William Oliver Fisher Deimler; fka	:	
William Oliver Fisher	:	
Debtors	:	
	:	
M&T BANK,	:	
Movant	:	
	:	
v.	:	
	:	
CRAIG BRADLEY DEIMLER	:	
WILLIAM OLIVER FISHER-DEIMLER	:	
aka William Oliver Fisher Deimler; fka	:	
William Oliver Fisher,	:	
Respondents	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtors' research of payments made.
7. Proof of amount owed is demanded at trial and this paragraph is therefore denied pending Debtors' research of payments made.
8. Denied that Movant has demonstrated cause for relief.

9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
Mott & Gendron Law
Attorney ID # 43568
125 State Street
Harrisburg, PA 17101
(717) 232-6650 TEL
(717) 232-0477 FAX
doriemott@aol.com